

From: [Joel Hecker](#)
To: [Morales, Susan](#)
Cc: [Mike Reid \(mreid@ci.olympia.wa.us\)](#)
Subject: RE: Hardel Site and Parking Lot/Formal Scrap Yard Eligibility Determinations - Olympia Brownfield Grant - BF01J66201
Date: Thursday, February 20, 2020 3:28:50 PM
Attachments: [image001.png](#)
[Region 10 Site Eligibility Worksheet - Jacks Auto Repair.pdf](#)
[JacksAutoRepair Site Map.pdf](#)

Thanks Susan!

For the parking lot site - I think it's a loss of institutional knowledge. I'll reconvene with Mike and we can figure out if we want to put in effort to see what we can locate records-wise for that site.

For the Hardel site - the Phase II will be focused on the upland portion of the site to verify that the property has been cleaned and to make sure no off-site migration is coming from the south. We do not plan to do any investigation of the tidelands. The area shown on the map (including the tidal waters) is the parcel boundary, so that is not DNR owned-land. Regardless though, there is no planned tidal work at this time.

The petroleum site I sent to the state was different than the ones I sent your way. It's a former gas station/auto repair center. I've attached that for your reference.

I saw the QAPP was downloaded by someone the other day. That's a good sign!

Joel

Joel Hecker, LG, PG

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From: Morales, Susan [mailto:Morales.Susan@epa.gov]
Sent: Thursday, February 20, 2020 3:20 PM
To: Joel Hecker <HeckerJ@uspioneer.com>
Cc: Mike Reid (mreid@ci.olympia.wa.us) <mreid@ci.olympia.wa.us>
Subject: RE: Hardel Site and Parking Lot/Formal Scrap Yard Eligibility Determinations - Olympia Brownfield Grant - BF01J66201

Hello Mike and Joel,

I've reviewed all three eligibility determination requests. The more time sensitive one was completed Monday but it didn't go through the email system until Tuesday morning. Let me know if you didn't already get it.

The parking lot/former welding shop does not appear eligible at this point because there is no defense to liability. It was acquired voluntarily and more recently so there needs to be a defense to liability and in this case AAI – All Appropriate Liability. The ideal situation is if the City conducted a ASTM phase 1 within 180 days of acquisition. It seems as if that it was purchased w/o the needed due diligence? Was there any research or investigation conducted prior to acquisition that would be considered equivalent to the ASTM standard in the year it was acquired?

The Hardel site eligibility description notes a very large site extending into tidal waters. What would be the focus or objective of the phase 2 work? Did you plan on it extending into the tidelands? If so would it stay within the Hardel Mutual owned portion vs going into DNR owned land?

This one appears eligible. I just want to be clear on the objective and tie to any state land. Confirm some additional details and I'll finalize the response on the determination.

Lastly, you mentioned sending an eligibility determination to the state for their determination. I saw all co-mingled proposed work. This wouldn't need state brownfields determination per se. It's certainly a good time to coordinate but unless there is a distinguishable area where contamination is petro then it doesn't go through petro review by the state. Let me know if you were referring to another site or one of three sent forward already.

SUSAN MORALES | BROWNFIELD COORDINATOR

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From: Joel Hecker <HeckerJ@uspioneer.com>

Sent: Wednesday, February 12, 2020 8:25 AM

To: Morales, Susan <Morales.Susan@epa.gov>

Cc: Mike Reid (<mreid@ci.olympia.wa.us> <mreid@ci.olympia.wa.us>)

Subject: Hardel Site and Parking Lot/Formal Scrap Yard Eligibility Determinations - Olympia Brownfield Grant - BF01J66201

Hi Susan – as promised, here are the first two EDs for the Olympia grant. The parking lot/former welding shop and metal scrap yard is the one that I'm guessing will be a bit sticky due to the City owning it (never operated on it or contributed to contamination).

Please confirm receipt. It's a rather big email. Let us know if you have questions.

Also – I submitted a petroleum ED to Ecology. As expected, they're a bit backed up and said they can get it to me by the end of the month. I'll forward on to you once I receive back.

Joel

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